

IRC 965 Transition Tax Statement**Taxpayer Name:****SSN/FEIN:**

AVX Corporation & Subs

Item**Amount**

Total amount required to be included in income by reason of section 965(a). Line 1 \$ 1,034,809,051.

Aggregate foreign cash position, if applicable. Line 2 \$ 1,034,809,051.

Total deduction under section 965(c). Line 3 \$ 526,424,256.

Total deemed paid foreign taxes associated with the total amount required to be included in income by reason of section 965(a). Line 4a \$ 297,079,272.

Total deemed paid foreign taxes disallowed pursuant to IRC 965(g)(1). Line 4b \$ 165,473,156.

Total net tax liability under section 965 (as determined under section 965(h)(6), without regard to whether such paragraph is applicable), if applicable, which will be assessed. Line 5 \$ 70,311,016.

Amount of the net tax liability under section 965 to be paid in installment under section 965(h), if applicable. Line 6 \$ 70,311,016.

Amount of the net tax liability under section 965, the payment of which has been deferred, under section 965(i), if applicable. Line 7 \$

Listing of applicable elections under section 965 or the election provided for in Notice 2018-13 that the taxpayer has made, if applicable.

Provision Under Which Election is Made	Title	Attached (Y or N)
Section 965(h)(1)	Election to Pay Net Tax Liability Under Section 965 in Installments under Section 965(h)(1)	Y
Section 965(i)(1)	S Corporation Shareholder Election to Defer Payment of Net Tax Liability Under Section 965 Under Section 965(i)(1)	N
Section 965(m)(1)(B)	Statement for Real Estate Investment Trusts Electing Deferred Inclusions Under Section 951(a)(1) By Reason of Section 965 Under Section 965(m)(1)(B)	N
Section 965(n)	Election Not to Apply Net Operating Loss Deduction under section 965(n)	N
Notice 2018-13, Section 3.02	Election Under Section 3.02 of Notice 2018-13 to Use Alternative Method to Compute Post-1986 Earnings and Profits	N

Under penalties of perjury, I declare that I have examined this statement, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than taxpayer) is based on all information of which preparer has any knowledge.

Signature of Taxpayer and/or Officer

1/11/19

**Defendant
Exhibit**

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